

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Magistrate's No. 20-435M

RODNEY STALLWORTH

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, David J. Anderchak, being first duly sworn, hereby depose and state as follows:

1. I have been employed as a Postal Inspector with the United States Postal Inspection Service since November of 2003. My duties include the investigation of crimes that involve the U.S. Postal Service and the U.S. mail. These crimes include mail fraud, mail theft, identity theft, burglaries and robberies of post offices, and counterfeit postal money orders. I am currently assigned to the External Crimes Team within the Pittsburgh Office and I have served as a member of the Financial Crimes Task Force of Southwestern Pennsylvania.

2. In the course of my training and experience, I have become familiar with the methods and techniques associated with the investigations of white-collar schemes to defraud. During these investigations, I have been involved in preparing and executing search warrants that have led to seizures of evidence of federal crimes.

3. Because this affidavit is submitted for the limited purpose of establishing probable cause to believe that Rodney Stallworth has participated in a conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, it does not include every fact known to me in connection with this investigation.

4. Dating back to at least 2010, the U.S. Postal Inspection Service and many other law enforcement agencies have been involved in coordinated investigations mainly along the east coast

of the United States into loosely organized groups—which have traditionally originated out of cities including Charlotte, NC and Atlanta, GA—that travel the country committing check fraud.

5. In their travels, these groups target industrial parks and office buildings stealing business checks from mailboxes. The groups then either counterfeit or “wash” the checks and create or produce counterfeit checks drawing on the victim businesses’ accounts in amounts between \$1500 and \$3000.

6. The scheme also involves the organizers or recruiters to recruit homeless individuals or transients, who then present and negotiate the counterfeit checks at the banks at which the account is drawn on. The recruited individuals that present the checks for payment are usually paid a small portion of the proceeds for their participation.

7. On February 20, 2020, your affiant met with Sgt. David Richards of the North Strabane Police Department regarding a number of counterfeit checks that had been negotiated against the PNC Bank account of Lighthouse Electric Company, Inc, which is a company located in the North Strabane Police jurisdiction. Based on information publicly available at FDIC.gov, PNC Bank is insured by the Federal Deposit Insurance Corporation.

8. Your affiant and Sgt. Richards made contact with PNC Bank Fraud investigators including Fraud Investigator Mark Best. PNC Bank related that a total of eight counterfeit Lighthouse Electric checks totaling approximately \$25,557.00 were cashed at Pittsburgh area PNC Bank branches on January 27 and January 28, 2020.

9. PNC Bank informed your affiant that the eight counterfeit Lighthouse Electric checks were made payable in the following names:

- Chelsie Stewart;
- Cierra Marie Crow;

- Angelique Starr Hajec;
- Scott Garlow.

10. PNC Bank informed your affiant that none of the individuals that presented the checks noted above were PNC Bank account holders but rather were successful in negotiating the counterfeit Lighthouse Electric checks because the Lighthouse Electric checks were drawn on a PNC account.

11. On February 26, 2020, your affiant contacted Lindsay Waltz, Accounting and Payroll Manager of Lighthouse Electric Company regarding the counterfeit checks noted above.

12. Waltz confirmed that Lighthouse Electric did not have a relationship with any of the individuals listed above as payees on the counterfeit checks and also confirmed that Lighthouse Electric did not issue the checks noted above to Chelsie Stewart, Cierra Crow, Angelique Hajec and Scott Garlow.

13. On February 21, 2020, an individual hereinafter referred to as CS-1 was interviewed at his/her residence regarding two counterfeit Lighthouse Electric Company checks that CS-1 negotiated at PNC Bank Eastside and Shadyside branches on January 28, 2020.

14. CS-1 was shown photocopies of the two Lighthouse Electric Company checks that were made payable to CS-1 in the amounts of \$1839.46 and \$1939.46, along with PNC Bank photographs connected to both of the transactions. CS-1 admitted that he/she had cashed both checks and acknowledged that he/she was the individual in the bank photos.

15. CS-1 was questioned about how CS-1 got involved in this situation. CS-1 indicated that he/she ran into a woman named Chelsie that CS-1 knew from "rehab", at the intersection of Fifth Avenue and Wood Street in downtown Pittsburgh earlier in the day on January 28, 2020. CS-1 related that he/she did not know Chelsie's last name but that Chelsie used the nickname of

“CC”. CS-1 stated that CC had a big screen TV and a “bunch of money” on her at this time and told CS-1 about the opportunity to make money by cashing checks. CS-1 related that CC had told him/her that she (CC) “had cashed some checks”.

16. According to CS-1, CC told CS-1 that all CS-1 had to do was “walk in, cash the check and you get \$100”. CS-1 also related that CC told him/her that CS-1 would only need one form of identification. CS-1 stated CC further explained to CS-1 that “my boy or cuz, he got checks. He’ll drive you to the bank”. CS-1 stated CC took a photo of CS-1’s identification and believed that CC texted the photo to somebody in order for the checks to be produced in CS-1’s name.

17. It should be noted, PNC Bank suffered additional losses in this matter due to the negotiation of several counterfeit Lighthouse Electric Company checks that were made payable to Chelsie Stewart. Your affiant showed CS-1 a PNC Bank photo dated January 27, 2020, connected to the negotiation of a counterfeit Lighthouse Electric check at the PNC Bank Lawrenceville branch which was made payable to Chelsie Stewart. A white female, believed to be Chelsie Stewart was captured in the photo. CS-1 confirmed that the woman in the photo was indeed the woman that CS-1 met at “rehab” named Chelsie or CC.

18. CS-1 related that on January 28, 2020, CS-1 and CC took a bus from Fifth and Wood to the Shakespeare Giant Eagle in East Liberty. CS-1 stated they then took a jitney to CC’s apartment in Wilkinsburg. CS-1 stated approximately 15 minutes after arriving at CC’s apartment, a black male showed up with the checks written in CS-1’s name.

19. CS-1 was asked to describe the person with the checks that arrived at the apartment. CS-1 stated he/she did not recall this individual’s name or nickname but described him as a black male, approximately 6’2” tall with dreadlocks and a thin build. CS-1 stated he did not have an

accent and that he/she believed that the man was from the Pittsburgh area. CS-1 continued to describe this man as having darker skin, clean shaven, and 30-40 years old. CS-1 informed that he was alone and drove a newer model blue four-door car with tinted windows and a car seat in the back. CS-1 stated he/she did not believe the vehicle to be a rental car.

20. CS-1 related that this man drove CS-1 and CC to the PNC Bank Eastside and Shadyside branches. CS-1 again confirmed that CS-1 cashed the two Lighthouse Electric checks and was paid a total of \$200 for CS-1's participation. CS-1 stated he/she gave all the rest of the money to the unidentified black male driver.

21. CS-1 stated the unidentified black male asked CS-1 to cash additional checks the next day but the plans fell through. CS-1 stated he/she and CC got into an argument after the unidentified black male driver left CC at one of the PNC Bank branches. CS-1 stated CC's purse remained in the vehicle after the male driver left CC at one of the branches.

22. On February 26, 2020, your affiant was contacted by Dollar Bank Investigations Officer Mackenzie Greenert regarding a series of counterfeit checks that were negotiated against the Dollar Bank account of Hearth and Home Furnishings in Zelienople, PA, in a similar fashion as the negotiations of the Lighthouse Electric checks. Based on information publicly available at FDIC.gov, Dollar Bank is insured by the Federal Deposit Insurance Corporation.

23. Greenert provided details on five counterfeit Hearth of Home Furnishings checks totaling approximately \$10,441.00 that were negotiated on February 26, 2020 in the following names:

- Scott Garlow;
- Zachary Kinslow.

24. On February 28, 2020, your affiant spoke with Eric Steck, Risk Detection Specialist from First National Bank. Based on information publicly available at FDIC.gov, First National Bank is insured by the Federal Deposit Insurance Corporation. Steck informed your affiant of a series of counterfeit Jordan Banana Company checks that were presented at Pittsburgh area First National Bank branches on January 29, 2020 by the following individual:

- Cierra Crow.

25. Steck related three counterfeit Jordan Banana Company checks had been negotiated by Cierra Crow, causing a loss of \$5519.14 to First National Bank. Steck also informed your affiant that a customer of Jordan Banana Company filed a police report regarding the theft of mail, during which it was believed a Jordan Banana Company check was stolen.

26. On February 28, 2020, your affiant reviewed Incident Report number 02-0811-2020 of the Chartiers Police Department in Houston, PA, completed by Sgt. Anthony Popeck, regarding the theft of mail from a business named Supply One in Bulgar, PA.

27. In the report, Supply One Accounting Assistant Sandy Plance reported that Supply One had not received checks from two customers: Jordan Banana and Serenity Hills Farms. She related that both checks were mailed to Supply One for payment and believed that somebody had stolen mail out of their mailbox.

28. Plance informed the Chartiers Police that, upon review by Jordan Banana Company and Serenity Hills Farms, it was determined that the checks that were mailed to Supply One had been altered to a different name and presented for payment. Plance related that Jordan Banana Company mailed a check payable to Supply One on January 20, 2020, and that this check was altered and was now made payable to Cierra Crow.

29. The financial institutions involved in this crime have provided your affiant and other members of law enforcement with any available bank photos and documentation connected to the check negotiations noted above. It appears as though legitimate Pennsylvania driver's licenses/identification cards were shown during the negotiations and that individuals that presented the checks used their true identities.

30. On Saturday, February 29, 2020, CS-1 contacted your affiant by phone and informed that CS-1 had received a text message on Friday, February 28, 2020 from somebody claiming to be named "John". CS-1 related that the text read "do you want to work tomorrow we're back in town". Later in the evening on February 29, 2020, CS-1 again contacted your affiant and informed that "John" planned on picking CS-1 up at 9AM.

31. On March 2, 2020, your Affiant and other investigators established surveillance at the intersection of South Highland Avenue and Alder Street, in the Shadyside section of Pittsburgh. Your Affiant observed that CS-1 was picked up at approximately 9:30 AM by an African-American male driving a Ford Fusion, bearing Wisconsin license plate AFA-9762.

32. The vehicle was loosely surveilled to the Eat'n Park parking lot located on Banksville Road, in Pittsburgh PA. At this time, from inside the Ford Fusion, CS-1 reported to your Affiant by text message that the driver of the car had entered an adjacent hotel—either the Days Inn or Comfort Inn—to get the checks.

33. At approximately 10:51 AM, an investigator saw the driver of the Fusion approach and reenter the car. Again, the vehicle was loosely surveilled to the Dollar Bank in the 5800 Block of Forbes Avenue in the Squirrel Hill section of Pittsburgh. CS-1 notified your Affiant by phone call that he/she was now inside the Dollar Bank. Upon arriving at the vicinity of the bank, your Affiant observed the African American male parking the Ford Fusion with the Wisconsin license

plate along Forbes Avenue across the street from the Bank. Your Affiant continued driving down the street to make a U-turn.

34. During that time, another investigator saw the African-American male approaching and entering the driver's side of the Ford Fusion. At this point, investigators approached the vehicle and detained the individual, later identified as Rodney Stallworth. While taking custody of Stallworth, investigators observed what appears to be a check, in the inside a compartment on the driver's side door. During a search incident to arrest, agents located a hotel room key card from a Comfort Inn, as well as a PNC Bank debit card in the name of Steven Baldwin.

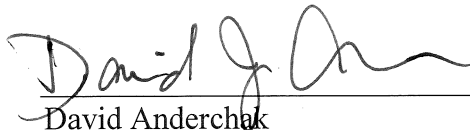
35. Stallworth executed a written Miranda waiver and agreed to speak with investigators. Stallworth indicated that he was working for an individual he knew as "John." He indicated that he was the driver, doing what he had been asked to do.

36. Investigators also spoke with CS-1, after Stallworth was in custody. CS-1 indicated that, while they were in the Ford Fusion, Stallworth had said that CS-1 could make as much as \$1,000 today, and that CS-1 "could work for us all week." CS-1 indicated that Stallworth was not the same person who had driven him/her to the PNC bank on January 28.

37. Your Affiant submits that, based on the foregoing, there is probable cause to believe that, in the Western District of Pennsylvania and elsewhere, Rodney Stallworth has engaged in a conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, in that he has conspired to defraud federally insured financial institutions and to obtain money and property under the custody or control of federally insured financial institutions by means of false or fraudulent pretenses or representations.

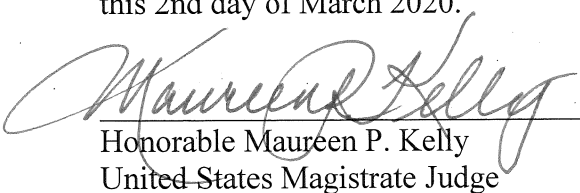
The above information is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "David J. Anderchak", written over a horizontal line.

David Anderchak  
U.S. Postal Inspector,  
U.S. Postal Inspection Service

Sworn and subscribed before me,  
this 2nd day of March 2020.

A handwritten signature in dark ink, appearing to read "Maureen P. Kelly", written over a horizontal line.

Honorable Maureen P. Kelly  
United States Magistrate Judge